

ROBINS  KAPLAN LLP

800 LASALLE AVENUE
SUITE 2800
MINNEAPOLIS MN 55402

612 349 8500 TEL
612 339 4181 FAX
ROBINSKAPLAN.COM

K. CRAIG WILDFANG
612 349 8554 TEL
KCWILDFANG@ROBINSKAPLAN.COM

March 26, 2018

The Honorable James Orenstein
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 1121

VIA ECF

Re: *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*
Case No. 1:05-MD-1720 (MKB)(JO)

Dear Judge Orenstein:

On March 20, 2018, Defendant Mastercard submitted a letter motion seeking a protective order limiting the upcoming April 20, 2018 deposition of Mastercard's CEO, Ajay Banga, to no more than four hours [DK7170]. On March 22, 2018 Your Honor directed Plaintiffs and Defendants "to continue to confer in an effort to resolve the matter on consent." We have continued to confer and the Plaintiffs have made a proposal to Mastercard which we hope will resolve the dispute. Plaintiffs are hopeful that Mastercard will accept our proposal, however, Mr. Gallo has informed us that Mastercard cannot respond to our proposal until tomorrow. Mr. Gallo has agreed to an extension until March 28 for Plaintiffs' joint response. In the event that we are unable to resolve the dispute, Plaintiffs respectfully request an extension until March 28, 2018 to submit our response to Mastercard's motion.

Very truly yours,

s/ K. Craig Wildfang

K. Craig Wildfang

cc: Counsel of Record (Via ECF)

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